

III. ARGUMENTS/REMARKS

Claims 1, 2, 5, 6, 9, 10, 12–27 are pending in the Instant Application.

Claims 1, 2, 5, 6, 9, 10, 12–27 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5659780 (“Wu”).

The Applicant respectfully requests reconsideration of the claims based on the amendments and based on the following remarks.

A. Currently-amended independent claim 1 is not anticipated by Wu.

The Applicant continues to traverse the rejection of claim 1 as being anticipated by Wu. Nevertheless, the rejection is moot in view of the amendments. The Applicant submits that Wu does not teach at least:

wherein the SIMD processor is operable to retrieve less than all bits stored in a first memory location in the first memory unit and less than all bits stored in a second memory location in the second memory unit, and wherein the SIMD processor is operable to concurrently perform filtering operations on the bits from the first memory location and the bits from the second memory location.

as is recited in currently-amended claim 1.

The Applicant notes that the amendment is supported by, for example, at least Figure 5 and paragraph [0048] of the Instant Application.

The Applicant also expressly reserves the right to present additional reasons that claim 1 is not anticipated by Wu, should the need arise.

B. The rejections of dependent claims 2, 5, 6, and 9 should be withdrawn at least because each depends from claim 1.

Based on the above, the Applicant believes the rejection of claim 1 should be withdrawn. Accordingly, the rejection of claims 2, 5, 6, and 9 should be withdrawn at least because each of claims 2, 5, 6, and 9 depends from claim 1.

The Applicant also expressly reserves the right to present additional reasons that claims 2, 5, 6, and 9 are not anticipated by Wu, should the need arise.

C. Currently-amended independent claim 10 is not anticipated by Wu.

The Applicant continues to traverse the rejection of claim 10 as being anticipated by Wu. Nevertheless, the rejection is moot in view of the amendments. The Applicant submits that Wu does not teach at least:

a first shift register operable to receive and store blocks of video data from the first memory unit, wherein the first shift register is adapted to selectively shift its contents by a predetermined number of bits corresponding to the number of bits used to represent one pixel, *said shift requiring only a single clock cycle*;

a second shift register operable to receive and store blocks of video data from the second memory unit, wherein the second shift register is operable to selectively shift its contents by a predetermined number of bits corresponding to the number of bits used to represent one pixel, *said shift requiring only a single clock cycle*;

as is recited in currently-amended claim 1.

The Applicant notes that the amendment is supported by, for example, at least ¶ [34] (“the SIMD processor 200 illustratively has a 28-bit instruction set every instruction takes one cycle.”); and ¶ [54] (“at line 6, the contents of registers Z1 602 and Z0 604 are shifted to the left one pixel (16 bits), which is achieved by using the Z1 register 602 itself as the source for the load instruction and shifting the contents being loaded 16 bits to the left.)

The Applicant also expressly reserves the right to present additional reasons that claim 10 is not anticipated by Wu, should the need arise.

D. Currently-amended independent claim 19 is not anticipated by Wu.

Claim 19 is similar to claim 10 in certain respects. Accordingly, the Applicant submits that the rejection of claim 19 should be withdrawn at least for the same reasons as the rejection of claim 10.

The Applicant also expressly reserves the right to present additional reasons that claim 19 is not anticipated by Wu, should the need arise.

- E. The rejections of dependent claims 12–18 and 20–27 should be withdrawn at least because each of claims 12–18 and 20–27 depends from one of claims 10 and 19.**

Based on the above, the Applicant believes the rejection of claim 10 should be withdrawn. Accordingly, the rejection of claims 12–18 and 20–27 should be withdrawn at least because each of claims 12–18 and 20–27 depends from one of claims 10 and 19.

The Applicant also expressly reserves the right to present additional reasons that claims 12–18 and 20–27 are not anticipated by Wu, should the need arise.

IV. CONCLUSION

In view of the foregoing, Applicant respectfully requests allowance of claims 1, 10, and 19, and claims 2, 5, 6, 9, 12-18, and 20-27 depending there from.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to the deposit account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

Respectfully submitted,

Date: May 23, 2011

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